

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JACKIE BURKS; BRUNILDA PAGAN CRAUZ;
VENUS CUADRADO; and RHONDA DRYE,
individually and on behalf of all persons similarly
situated,

Civil Action No.

1:20-cv-01001(RPK)(SMG)

Plaintiffs,

Oral Argument Requested

-against-

GOTHAM PROCESS, INC.; MULLOOLY, JEFFERY,
ROONEY & FLYNN, LLP; BASSEM ELASHRAFI;
and CARL BOUTON,

Defendants.

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NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the Declaration of Robert J. Bergson, dated September 4, 2020, and the exhibit annexed thereto, the accompanying Memorandum of Law, dated September 4, 2020, and the prior pleadings and proceedings herein, defendant Mullooly, Jeffery, Rooney & Flynn, LLP (“Defendant”), will move this Court before the Honorable Rachel P. Kovner, at the Federal Courthouse, located at 225 Cadman Plaza East, Brooklyn, New York 11201, for an order pursuant to Fed. R. Civ. P. 12(b)(6), dismissing the Amended Complaint, as against Defendant, in its entirety and with prejudice, together with such other relief as the Court deems just and proper.

Dated: New York, New York
September 4, 2020

ABRAMS GARFINKEL
MARGOLIS BERGSON, LLP

By: /s/ Robert J. Bergson
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TO: All counsel of record via ECF